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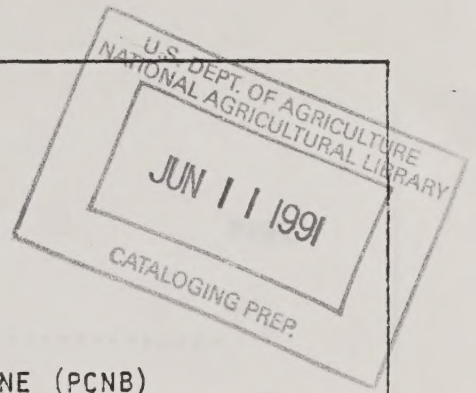
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5 ASSESSMENT OF PENTACHLORONITROBENZENE (PCNB)
6 FUNGICIDE USES IN AGRICULTURE
7 REPORT I

8 USDA/STATE/EPA ASSESSMENT TEAM OF THE
9 NATIONAL AGRICULTURAL PESTICIDE IMPACT ASSESSMENT PROGRAM
10 UNITED STATES DEPARTMENT OF AGRICULTURE
11
12
13

14 COORDINATED BY THE OFFICE OF ENVIRONMENTAL
15 QUALITY ACTIVITIES
16 USDA
17
18

19 April 30, 1978
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9. After application, the PCNB is covered or disked into the soil so it is not exposed.

10. PCNB is practically insoluble in water; therefore it stands little chance of contaminating water systems.

5 Evaluation of the triggers--Although the committee is in no position to
6 evaluate the triggers, it is possible to emphasize what has been done
7 relevant to the validity of the triggers and to include new information.

8 A. In regard to bioaccumulation and metabolism in animals, in
9 the study of Finegan et al (1958) in which a determination was made of
10 the amount of PCNB stored in the fat of male and female rats when fed 0,
11 63.5, 1250, or 2500 ppm PCNB for 3 months, the results showed a dose-
12 related increase in PCNB content of fat tissue. Tissues of sacrificed
13 rats were analyzed by neutron activation of chlorine. Though increasing
14 quantities of chlorine were found in rats fed increasing amounts of the
15 material, it was pointed out by Kuchar et al (1969) that the neutron act-
16 ivity process was not adequate for determining residues of PCNB or its
17 metabolites in animals. Borzellaca et al (1971) stated that the residue
18 in the fat originally identified as PCNB consisted mostly of PCB and HCB.

19 In the Borzellaca et al (1971) experiment in which cows were
20 given PCNB orally (in gelatin capsules) at levels of 0, 0.1, 1.0, or 10.0
21 ppm for 12 to 16 weeks, milk and subcutaneous fat were analyzed. In the
22 milk, there was little indication of dose-level-related changes and in
23 the fat PCA (2,3,4,5,6 pentachloroaniline) stabilized at .1 ppm at the
24 highest level fed. The residues of PCA (probably a misprint and should
25 have been PCB (2,3,4,5,6 pentachlorobenzene) PCNB and MPCPS (S-methyl
26 pentachlorophenyl sulfide) were negligible or non-detectable. It was
27 stated that "the levels of detectability for control and treated samples

1 differed from week to week; consequently, the results are difficult to
2 assess accurately."

3 In the Borzellaca (1971) study on dogs, they were fed 0,5,30,180, or
4 1080 ppm PCNB in their diets for 2 years, after which the presence of
5 PCNB, PCB, HCB, PCA and MPCPS in the liver, kidney, fat and feces was
6 detected for all dose levels but 1080 ppm. PCNB was not detected in the
7 liver, kidney or fat tissues but was detected in the feces.

8 Goursand et al (1972) studied the relationship of HCB (hexachloro-
9 benzene) residues in endive roots with the HCB levels in milk from cows
10 eating the roots. The authors concluded that the HCB contamination in
11 the milk was linked to the application of PCNB to the endive but they
12 speculated that the source of the HCB was from the original formulation
13 rather than from the degradation of PCNB. In these studies, PCNB resi-
14 dues were negligible for all samples.

15 On page 12 of the EPA (OPP-30,000/17) Pesticide Programs Notice of
16 Rebuttable Presumption Against Registration and Continuing Registration
17 of Pesticide Products containing Pentachloronitrobenzene (PCNB) reports
18 are listed of HCB being assimilated in sheep, chickens, Japanese quail,
19 kestrels, rats, aquatic organisms, fish, poultry products, birds, edible
20 animal tissues, and human milk and tissues. Inasmuch as no mention is
21 made of the sources of HCB, it is questioned as to whether this informa-
22 tion should be included in a report on PCNB.

23 In summary of the triggers on the bioaccumulation and metabolism in
24 animals, PCNB has not been shown to accumulate in animals in the experi-
25 ments listed. Other materials such as PCA, PCB, HCB and MPCPS appear not
26 to be products of metabolism of PCNB but occur in the animal tissues be-
27 cause of being contaminants in the PCNB samples used.

1 B. In regard to toxicity of PCNB, in feeding tests by Finnegan et al
2 (1958) 10 mongrel dogs were fed doses up to 2.5 g/kg and no deaths re-
3 sulted though half the dogs vomited. Three mongrel dogs on diets of 25,
4 200, or 1000 ppm for one year did not show any growth inhibition or sig-
5 nificant hemalotological or histopathological changes. The same authors
6 reported studies in which 10 male and 10 female rats were fed PCNB at
7 rates of 0, 25, 100, 300, 1000 or 2500 ppm. Deaths did not correlate
8 with dose of PCNB though female rats showed a slight growth suppression
9 at 100 ppm and above. Hematological values were within normal ranges
10 and lung abscesses and fatty changes in the liver did not correlate with
11 PCNB dose. There was accelerated growth rate in male rats, particularly
12 at 25 ppm.

13 Borzellaca et al (1971) using male New Zealand rabbits in percutan-
14 eous studies with PCNB at rates of 10.0 ml/kg and 13.3 ml/kg of a 30%
15 solution applied to 10 rabbits with intact skin and 10 rabbits with
16 abraded skin found no indications of toxicity or skin irritation during
17 14 days following treatment. They also found in a dog study using
18 beagles approximately 4.5 months old and fed 0, 5, 30, 180 or 1800 ppm
19 for 2 years that there were no dose related effects on urine analysis,
20 blood chemistry, mortality, body weight, food consumption or estrus
21 cycle. There was a significant decrease in the ratio of volume of packed
22 red blood cells to the volume of whole blood in male dogs at 30 and 180
23 ppm but no change in males fed 1080 ppm. Dogs sacrificed at 1 year
24 showed no treatment related lesions and though dogs sacrificed after 2
25 years showed cholestatic hepatasis with secondary bile nephrosis at
26 feeding doses of 180 ppm and 1080 ppm, the authors considered these
27 reversible.

1 In FAO-WHO report (1970) 10 male and 10 female rats fed PCNB at
2 the rate of 0, 1,000, 5,000 or 10,000 ppm for 90 days showed a growth
3 rate only slightly less than controls at 5,000 ppm and a lower growth
4 rate at 10,000 ppm.

5 In the Finnegan et al (1958) study, groups of 7 male and 7 female
6 rats were fed diets containing 0, 63.5, 635, 1250, 2500 or 5000 ppm PCNB.
7 In this study body weights of males were depressed significantly at the
8 2500 ppm level. Males and females at 5000 ppm were killed at the end of
9 2 weeks. At 1250 and 2500 ppm levels, the kidney-to-body weight ratios
10 in male rats showed significant increases.

11 In a study conducted by Farbwerke Hoechst HG (FAO/WHO 1970) groups
12 of 3 males and 3 female dogs were fed PCNB at 0, 500, 1000, and 5000 ppm
13 for 2 years. Liver changes occurred in all groups and were dose related.
14 At 5000 ppm, fibrosis, narrowing of hepatic cells, thick leucocyte
15 infiltration and increased size of the periportal areas resulted. The
16 highest level also produced atrophy of bone marrow and reduced hemato-
17 poiesis.

18 In summarizing the results of the experiments reported on toxicity
19 of PCNB, all of the tests done except two showed little or no toxic
20 effects of PCNB to animals used. In the two studies mentioned above,
21 deleterious effects were recorded but it should be pointed out that the
22 feeding levels at which these occurred (1250, 2500 or 5000) are extreme-
23 ly high.

24 The experiments reporting oncogenicity also need to be reviewed
25 critically. In the Hazelton Carcinogenesis Bioassay of PCNB, 50 male
26 and 50 female rats and mice were used. Male rats were fed 5000 to 7500
27 ppm in one group and 10,000 to 15,000 ppm in another group for 14 weeks.

1 These were then reduced to the lower dosage for 64 weeks. Female rats
2 were then reduced to the lower dosage for 64 weeks. Female rats were fed
3 11,000 or 22,000 ppm for 14 weeks when these doses were reduced to 7250
4 and 14,500 ppm respectively for the remaining 64 weeks. Low dose male
5 mice received 1075 to 3000 ppm whereas high dose male mice received 2150
6 to 6000 ppm. Low dose female mice were fed 2320 to 4500 ppm whereas high
7 dose female mice received 4640 to 9000 ppm. All mice were fed for 78
8 weeks. The results in carcinomas and malignant tumors were not statisti-
9 cally significant. According to the report carcinomas of the liver devel-
10 oped in 8 of 18 mice indicating a significant difference over those in
11 the control. However, when the National Cancer Institute (1978) analyzed
12 the data from these experiments, it reported (page B-3) that 8 of 35
13 mice developed liver carcinoma and that under the conditions of the ex-
14 periment, this was not significantly different from the control. In
15 fact, the National Cancer Institute concluded after analyzing this study
16 "that under the conditions of this bioassay, PCNB was not carcinogenic
17 in either Osborne-Mendel rats or B6C 3F1 mice."

18 The Mouse Study of the Central Institute for Nutrition and Food
19 Research (Van der Heyden and Til 1974) as reported in the EPA Pesticide
20 Program on PCNB includes information indicating that Albert (1977) con-
21 cluded there were significantly more fibromas and fibrocarsomas in fe-
22 male mice fed 1200 ppm than in female controls. However, no conclusions
23 by the Central Institute for Nutrition and Food Research were given in
24 the EPA PCNB report.

25 Albert (1977) also analyzed the results of the Central Institute for
26 Nutrition and Food Research in its rat study and found significantly more
27 lymphoretic tumors of the lung in males ingesting 100 ppm than the

1 controls. It is interesting that tissue examination were made only from
2 20 males and females in the controls and 1200 ppm groups and were limited
3 to the liver and to grossly visible tumors or lesions suspected of being
4 tumors for all other animals. Thus the only lesions on the lungs diagno-
5 sed were those large enough to be seen by the naked eye. Others were not
6 detected and could have made a difference. Also, no conclusions by the
7 Central Institute were recorded for this study in the EPA RPAR.

8 Several questions can be raised about the Innes Mouse Study (Innes
9 et al 1969). The maximum tolerated dosage was fed unweaned mice from the
10 7th day to the 28th day at which time they were fed 1206 ppm. Is it a
11 fair or logical experiment to treat extremely young animals with the
12 maximum tolerable dose? Also why were not the conclusions of Innes et al
13 included in the EPA RPAR? It also should be noted that although the pur-
14 ity of PCNB was not reported, it was thought to be 88% PCNB and 11% HCB.
15 The latter is an excessively high rate for that material considering
16 PCNB now averages approximately 0.6 HCB.

17 The experiment on the Tumor Initiating Study in Mice (Searle 1966)
18 can hardly be considered valid because after the PCNB applications which
19 lasted 12 weeks, the same mice received croton oil applications for 20
20 weeks. To make the experiment valid, mice with no PCNB treatment also
21 should have been treated with croton oil for 20 weeks. Inasmuch as this
22 was not done, the conclusions as to the effect of PCNB are invalid.

23 In summarizing the information given in the oncogenicity triggers,
24 it appears that in some reports, there was no significant carcinogeni-
25 city, summarizations by the reporting agencies were not included or the
26 experiments were not validly conducted with regard to PCNB.

and turf.

8. PCNB gives control of Typhula, Fusarium, Puccinia (rusts) and Ustilago (smuts) on turf grasses.

9. PCNB ^{is usually} ~~when used is nearly always~~ added to the soil as a pre-plant treatment or ~~is added~~ at the time of seeding or planting, or is used as a seed treatment material. This means that ^{normal} in useage, nearly all of the PCNB used is disked ^{up?} into soil or covered ^{by soil} with it leaving practically none ^{to} exposed.

10. PCNB is used at extremely low rates. ^{most PCNB applications for seed and in furrow treatments} In seed treatment up to 5 ^{ingredient} ounces active may be used per acre. In-furrow treatments use only ^{the rate is 1-2} ~~1-2~~ ¹⁻ ~~pound on up to~~ 5 pounds per acre.

11. PCNB is insoluble in water meaning that it does not enter water systems.

~~12. PCNB has a short life span in soil.~~

13. It is used only a short period of time each year and usually only once on a crop.

14. Workers handling PCNB are exposed only for brief periods such as opening and pouring treated seed or the fungicide into hopper boxes. Very few individuals are involved in the handling of the material.

15. Much of the PCNB used is either as a seed treatment or granular ^{which is the most common application} formulation, both of which are virtually dustless.

16. Of the triggers, few show real ^{apparent} hazards and those that do used PCNB at relatively high dosages.

17. Some of the triggers indicate that contaminants in PCNB are hazardous, particularly HCB. This material has been reduced to 0.5% or less in commercially available PCNB.

18. PCNB continues to be a relatively inexpensive pesticide to use.

1 19. Because PCNB has a limited effective range, it will do little
2 to upset the biological ecosystems where it is used. —

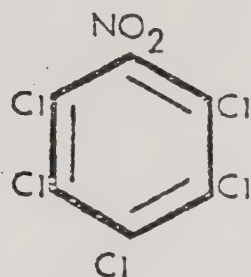
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Introduction

~~Introduction.~~ On October 13, 1977 a Rebuttable Presumption Against Registration and Continued Registration was issued regarding the fungistat ~~Pentachloronitrobenzene~~ (also known as PCNB and Quintozene). The purpose of this report is to bring together information regarding the risks and the benefits of this ~~fungistat~~ ^{fungicide}.

The major uses of ~~Pentachloronitrobenzene~~, henceforth referred to as PCNB in this paper, are prevention of seedling diseases of cotton, the control of southern root rot of peanuts, the control of seedling and root rots of various vegetables, the control of several diseases of turf grasses and the prevention and control of various soil-borne diseases of ornamental plants. ^{No mention of its use in} PCNB is ~~used in control~~ ^{used as} only ~~a soil-borne~~ plant pathogens and is applied as a seed treatment material, as a soil application prior to planting followed by discing ^{or spray} ~~on~~ as a drench on growing plants. Because of its effectiveness and wide use in the production of many agricultural crops, it is necessary to weigh the benefits of this material and compare them with the risks ^{from exposure} ~~and the fact that~~ ~~PCNB has been found to exceed certain risk criteria.~~

pentachloronitrobenzene



- Properties:** Colorless crystalline needles practically insoluble in water; soluble in carbon disulfide, benzene, chloroform, carbon tetrachloride; slightly soluble (2%) in ethanol and methanol; pH 2.0 to 6.0; stable under normal conditions; technical, characteristic odor; MW 295.4
- Compatibility:** Compatible with most pesticides: captan, dithiocarbamates, antibiotics, aldrin, dieldrin, endrin, toxaphene, DDT, Nemagon, and fertilizer; compatible with dinitros when they are mixed with water prior to adding PCNB
- Mammalian toxicity:** Acute oral (rat) $\text{LD}_{50} > 1200$ mg/kg
- Formulations:** 10%, 20%, 40%, dusts, 75% WP, 24% EC (2 lb/gal)
- Phytotoxicity:** May reduce rooting of some plants; most plants may be planted immediately after soil application
- Uses:** Soil treatment for diseases caused by species of Botrytis, Rhizoctonia, Sclerotinia, Sclerotium, and a few other genera; seed treatment and bulb dip in combination with other fungicides
- Trade names:** Best Turf Fungicide, Botrilex, Brassicol, Folosan, Fungiclor, Pent-o-bunt, quintozone, * Terraclor, Terracap (+ captan), Tilcarex, Tritisan, Panterra (+ methylmercury dicyandiamide), Orthocide Soil Treater X (+ captan)
- Approximate price:** 20% dust: \$27/cwt 50-lb bag, 75% WP: 83¢/lb, 30 gal (24% EC) \$3.10/gal
- Basic producer:** Olin Mathieson Chem Corp

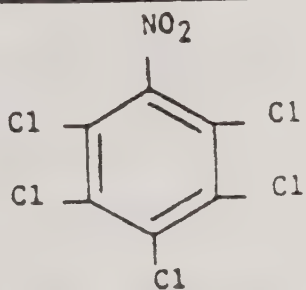
*British Standards Institute common name.

Biological and Environmental Fate

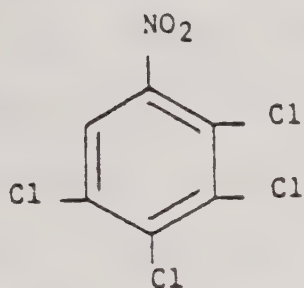
The half-life of PCNB in 3 soil types at 25° C has been shown to range from 4.7 to 9.7 months ⁶⁰ (~~24~~). PCNB is not very soluble and does not leach very easily from the soil ⁴⁸ (~~17~~) as demonstrated by soil TLC, which confirms that PCNB is relatively immobile ³³ (~~19~~).

Loss of PCNB from soil is due primarily to microbial degradation. Many microorganisms have the ability to convert PCNB to pentachloro-aniline (PCA) ¹⁵ (~~3~~), a process favored by flooding ⁴³ (~~16~~). Formation of PCA extends fungitoxic activity, a likely result of oxidation by soil microorganisms to produce PCNB ⁴⁰ (~~14~~).

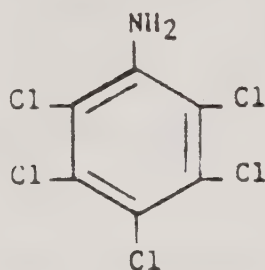
A number of compounds have been identified in PCNB-treated soils ^{30, 39, 41, 49} (~~8, 12, 14, 18~~). These include the following:



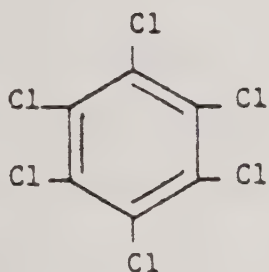
PCNB



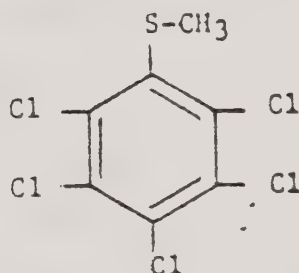
Tetrachloronitrobenzene (TCNB)



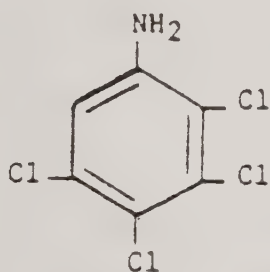
PCA



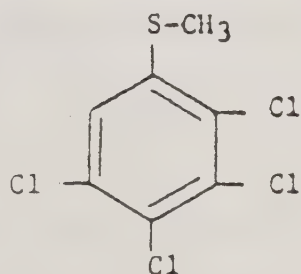
Hexachlorobenzene (HCB)



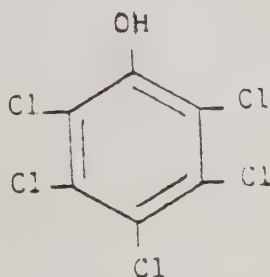
Pentachlorothioanisole (PCTA)



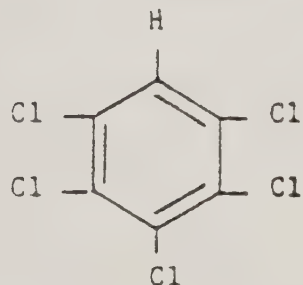
Tetrachloroaniline (TCA)



Tetrachlorothioanisole (TCTA)



Pentachlorophenol (PCP)



Pentachlorobenzene (PCB)

1 TCNB, HCB and PCB are usually present as impurities in technical
 2 PCNB ²⁰ (X). A recent study ⁴¹ (14) using ^{14}C -labeled PCNB indicated that
 3 under anaerobic conditions a small amount of PCP is produced in PCNB-
 4 treated soil. Slightly less than 0.5% of the ^{14}C was recovered as PCP
 5 from flooded soils ⁴¹ (14). PCNB has been shown to disappear rapidly from
 6 soils that were anaerobic from flooding or oxygen exclusion ⁶¹ (25). This
 7 process is accelerated by organic ammendments ⁶¹ (25).

8 There is some loss of PCNB as well as HCB, PCA, and PCTA by
 9 volatilization from aerated soils ^{14, 39} (1, 12). PCNB has sufficient vapor
 10 pressure to diffuse through the soil ²⁷ (9), and fungitoxic concentrations
 11 have been found in soil air when PCNB was applied to seed rows or used
 12 for seed treatment ⁵³ (20).

13 Application of PCNB as well as benomyl, captan or thiram increased
 14 the amount of exchangeable Mn, Na and Zn in the soil ⁵⁹ (25). In soil
 15 treated with PCNB, the half-^{lives} ~~life~~ of other pesticides present ^{have} ~~has~~ been
 16 extended ⁴⁰ (12). This is probably due to the degradative enzyme-substrate
 17 (pesticides in this case) ratio ⁴⁰ (12).

18
 19 The vapor pressure of PCNB is such that one would expect some loss
 20 from the soil by volatilization. Photoreduction of PCNB to
 21 tetrachlorobenzene is one route of environmental loss of this fungicide
 22 ^{5, 58, 63} (1, 12, 26). UV irradiation of PCNB in various solutions produced a
 23 rather slow decomposition ¹⁸ (6). The primary reaction was reductive
 24 dechlorination ¹⁸ (6).

25
 26 Potatoes grown in PCNB-treated soil contained PCNB, particularly
 27 in peels ²⁶ (3). Conversion products were also detected; PCA was the only

1 one identified ²⁶ (8).

2 In young cotton plants grown 1 or 2 weeks in soil treated with 300
3 ppm PCNB, large amounts of PCNB and small amounts of PCB, TCNB, HCB, PCA
4 and PCTA were present in the green parts of the plant ⁴⁴ (16). There were
5 similar findings in young corn and soybean plants ⁴⁴ (16).

6 Rabbits were dosed with 2g unlabeled PCNB by stomach tube, and over
7 a 72-hour collecting period ⁷ (2):

- 8 46 - 62% excreted unchanged in feces
- 9 4 - 14% excreted in urine as N-acetyl-S-pentachlorophenylcepteine
- 10 12 - 14% excreted in urine as free and conjugated PCA

11 No PCNB was detected in the milk of a lactating cow fed 5 ppm
12 unlabeled PCNB for 5 days ⁵⁷ (21). Urine collected from the onset of the
13 experiment until 2 days after the last feeding contained 45% of the PCNB
14 administered ⁵⁷ (21).

15 There have been a variety of long-term feeding studies using dogs,
16 rats and cows ^{13, 50} (3, 14). Most of the PCNB was excreted in the urine and
17 feces. PCNB was present in low quantities or not at all in the tissues
18 of these animals.

19 In studies ³⁸ (14) using fish exposed to a number of concentrations of
20 Terrachlor (75% ai) for various periods of time, the following L C 50's
21 were reported:

	<u>L C 50</u>	
	<u>Bluegill</u>	<u>Rainbow Trout</u>
	<u>(Lepomis macrochirus)</u>	<u>(Salmo gairdneri)</u>
25 24 h	0.42 ppm	0.42 ppm
26	7.4 ppm	

1 96 h 0.29 ppm 0.31 ppm

2 0.38 ppm / 2.5

3 There have been no animal studies using radiolabeled PCNB. This
4 appears to be a data gap.

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SUMMARY OF THE REBUTTABLE PRESUMPTION --
ONCOGENICITY

40 CFR 162.11 (a) (3) (ii) (A) provides that a "rebuttable pre-
sumption shall arise if a pesticide's ingredient(s) . . . (i) nduces onco-
genic effects in experimental mammalian species or in man as a result of
oral, inhalation, or dermal exposure. . . ." Section 162.3(bb) defines
the term oncogenic as "the property of a substance or a mixture of sub-
stances to produce or induce benign or malignant tumor formation in liv-
ing animals."

Environmental Protection

Several studies have been examined by the Agency which present
(12)
evidence that PCNB meets the above criterion. Briefly, these findings:

1 1. A significant increase in hepatic carcinomas in male mice
2 exposed to 1000 to 3000 ppm PCNB in the diet ($p < 0.021$).

3 2. A significant increase in fibrosarcomas of the skin in female
4 mice at 1200 ppm in the diet ($p < 0.001$).

5 3. A significant increase in hepatomas in male mice fed 1206 ppm
6 in the diet ($p < 0.011$).

7 4. A significant increase in skin papillomas in mice receiving
8 PCNB as an initiating agent followed by croton oil applications (males,
9 $p < 0.0225$; males and females and females combined, $p < 0.011$).

10 5. A higher occurrence of malignant lymphoreticular tumors in
11 male rats exposed to 1200 ppm in the diet ($p < 0.0548$).

12 ^{Summaries}
Following are ~~descriptions~~ of the tests which resulted in these
13 conclusions.

14 A. Hazleton Carcinogenesis Bioassay of PCNB

15 A carcinogenesis bioassay of PCNB was started in 1972 at Hazle-
16 ton Laboratories, Inc. on behalf of the National Cancer Institute. The
17 experiments used Osborne-Mendel rats (Supplier: BmI) and B6C3F1 mice
18 (Supplier: Charles River Laboratories).

19 These animals were fed a mixture of corn oil and PCNB ad libitum
20 at two dose levels, with 50 males and 50 females of each species in each
21 group. Control groups for each species consisted of 20 animals of each
22 sex.

23 The composition of the PCNB has been reported by the supplier as

24 ~~(Orin Corporation, 1976)~~ follows:

	<u>weight (%)</u>
Pentachloronitrobenzene	98.1-98.2
Pentachlorobenzene	0.11-0.16

Chloranil	0.13-0.15
2,3,4,5-Tetrachloro-	0.22-0.29
nitrobenzene	
Hexachlorobenzene	1.0
High Boiler (unknown)	0.30-0.22

Male rats in the low dose group received 7,500 to 5,000 pp,. and 15,000 to 10,000 ppm PCNB in the high dose group. These doses were decreased to the second dosage rate after 14 weeks and continued until feeding was completed at 78 weeks. Low dose females were fed 11,000 ppm for 14 weeks; this was decreased to 7,250 ppm PCNB for the remainder of the experiment. High dose females received 22,000 ppm for 14 weeks and 14,500 ppm for the remaining feeding period. All animals were sacrificed after 111-113 weeks.

Mice were fed PCNB for 78 weeks. Low dose males were fed increasing doses of 1,075 ppm to 3,000 ppm, and high dose males received 2,150 to 6,000 ppm. Low dose females were fed 2,320 to 4,500 ppm and the high dose groups received 4,640 to 9,000 ppm. Surviving animals were sacrificed 91 to 93 weeks after the start of feeding.

The results obtained from rats showed a higher incidence of carcinomas in low dose PCNB-treated males and females. Female rats fed the low dose also had increases in statistically significant ($p < 0.05$).

Carcinomas of the liver increased in low dose male mice, with eight of eighteen mice (44%) in that group, compared to two of twenty control male mice, developing carcinomas. This is significant at $p = 0.021$, ~~(Albert 1977)~~

B. Central Institute for Nutrition and Food Research -- Mouse Study

At the request of Farbwerke Hoechst AG (Frankfurt, W. Germany), the Central Institute for Nutrition and Food Research conducted a mouse carcinogenesis bioassay of PCNB. ~~(Van der Weijden and Til 1974)~~. According to the report, the technical grade sample contained:

	<u>weight (%)</u>
Pentachloronitrobenzene	98.2-98.3
Hexachlorobenzene	2.7
2,3,4,5-tetrachloronitrobenzene	1.1
2,3,5,6,-tetrachloronitrobenzene and 2,3,4,6-tetrachloronitrobenzene	0.64
Chloranil	<0.5

Diet pellets were administered ad libitum to SPF (Swiss random bred) males and females in 0,100, 400, and 1200 ppm dose groups for 80 weeks.

Gross necropsies were conducted. Tissues and tissues with gross abnormalities, three sections of the liver and each lung lobe were histologically prepared and examined. The gross examination showed skin abscesses and subcutaneous masses in females that had ingested 1200⁰ ppm PCNB. From tissue specimens, they were identified as fibromas and fibrosarcomas. 12 of 91 females at this dose level, compared to none of the 90 control females, had these tumors at $p < 0.001$. ~~(Albert 1977)~~

C. Central Institute for Nutrition and Food Research -- Rat Study

In September, 1971 the Institute began a carcinogenesis test for PCNB on rats at the behest of Farbwerke Hoechst A. G. ~~(Anonymous undated)~~. The technical material was the same as that used in the mouse study.

1 Males and females, 50 per dose group, were fed a diet of 0, 100, 400
2 and 1200 ppm for 104 weeks.

3 Complete gross necropsies were conducted to provide tissues for
4 histological fixing and scrutiny. Tissue examinations were detailed for
5 20 males and females from the control and 1200 ppm groups, but were lim-
6 ited to the liver for all other animals and to grossly visible tumors or
7 lesions suspected of being tumors.

8 26 of 47 (55%) males ingesting 100 ppm had significantly more
9 lymphoreticular tumors of the lung ($p < 0.0548$). Most of these tumors
10 were found in treated males and 8 of 44 tumors were seen in untreated
11 males (Albert 1977).

12 D. Innes Mouse Study

13 A tumorigenicity screening study on PCNB was conducted by Bio-
14 netics Research Laboratories, Inc. from 1966-1967 for the National Can-
15 cer Institute. ~~(Innes et al. 1969)~~ While the purity of the sample was
16 not reported, it is suspected that it contained about 88% PCNB and 11%
17 hexachlorobenzene, ~~(U.S.E.P.A. 1976b)~~

18 Strain X and Strain Y mice, (C57BL-6 x C3H/Anf)F1 and (C57BL/6 x
19 AKR)F1, respectively, were administered 464 mg/kg PCNB (maximum tolera-
20 ted dose) by stomach tube at seven to 28 days of age and orally in the
21 diet ad libitum at 1,206 ppm up to necropsy at 78 weeks. There were 18
22 males and 18 females of each species in the control and treated groups.

23 Mice were grossly examined post mortem externally and in the
24 thoracic and abdominal cavities. Tissues of major organs and of grossly
25 visible lesions were reviewed microscopically. The cranium and thyroid
26 glands were not dissected.

27 A significantly elevated incidence of liver tumors was found in

1 the Strain Y males ingesting PCNB. 10 of 17 (59%) treated males compar-
2 ed to 1 of 17 (6%) of control males had heptomas at $p < 0.0024$, (~~Albert 1977~~)
3 ~~bert 1977~~)

4 E. Tumor Initiating Study in Mice

5 The University of Birmingham Cancer Research Laboratories in
6 Birmingham, England has conducted a study on the tumor initiatory acti-
7 vity of technical PCNB. (~~Scarle 1966~~) The purity of the compound was
8 not reported.

9 Treated and untreated groups of albino mice (backgrounds unspeci-
10 fied), 6-8 weeks old, were assigned 10 males and 10 females each. The
11 backs of mice to be treated were shaven and 0.3% PCNB dissolved in 0.2
12 ml acetone was applied twice weekly for 12 weeks. These mice then re-
13 ceived applications of 0.25% croton oil on the same skin area for ano-
14 ther 20 weeks. Mice were killed 20 weeks after the last croton oil
15 treatment.

16 Total number of tumors and the numbers of mice bearing visible
17 skin tumors were recorded weekly during croton oil treatment, and bi-
18 weekly thereafter. Papillomas less than 1 mm in diameter or persisting
19 less than three weeks were not counted.

20 Mice from treated and untreated groups began to develop papillo-
21 mas after 508 weeks of croton oil treatment. Papillomas increased in
22 number until 5-10 weeks after cessation of applications, when some papi-
23 llomas regressed. Seven treated males had tumors as compared to only
24 one in the control group, significant at $p < 0.225$. (~~Albert 1977~~)

25 Also, 14 of 20 treated males and females (combined), compared to
26 5 of 20 untreated males and females (combined), had papillomas, which
27 is significant at $p < 0.0225$.

Risks Related to Exposure associated with Registered Uses

1 ~~Exposure and hazards associated with registered uses~~--The plant dis-
2 ease-producing organisms controlled by PCNB are nearly all soil-borne.
3 In control measures PCNB is applied to seeds, vegetative parts used as
4 seed (or propagative material) or to the soil. Soil application is made
5 either as in-furrow, broadcast or spray treatments. In the former, the
6 PCNB is covered by the planting equipment and in the latter two is disked
7 in the soil. Thus no matter how PCNB is used, it is covered by or work-
8 ed into the soil thus reducing exposure and drift so that they are vir-
9 tually non-existent. Most applications are made only once a growing sea-
10 son or once a crop, thus minimizing the amounts used.

11 PCNB is available at 10%, 20%, 40% and 80% dusts, a 75% wettable pow-
12 der, and emulsifiable concentrate and a 10% granular form.

13 Seed treatments are generally done by commercial processors using
14 principally the Terra-Coat formulations of PCNB which dry to a hard fin-
15 ish on the seed and do not dust off during further handling. The only
16 potential exposure occurs when workers are plumbing the source supply to
17 the treating equipment. Some seeds are treated by a slurry method. Po-
18 tential exposure in this method occurs during the mixing of the slurry
19 and the bagging of treated seed. Once treated, little of the fungicide
20 comes off the seed. The only other potential exposure is during the
21 limited time the treated seed is poured into the hopper boxes on planting
22 equipment. A third form of seed treatment is done by pouring the chemi-
23 cal into hopper boxes in layers with the seed. Worker exposure is limit-
24 ed to the opening of the container and measuring the PCNB into the hopper
25 box.

26 For in-furrow treatments, PCNB is used principally as a granular mat-
27 erial. Exposure is limited to opening the bag and pouring into the

1 applicator. Granular formulations have little or no dust and therefore
2 are very safe. In-furrow treatments also may be made with a liquid for-
3 mulation. Exposure is limited to opening the can and mixing the concen-
4 trate with water. With all in-furrow treatments, the material is cover-
5 ed immediately by the planting device.

6 Broadcast treatments may be made using granular, liquid or wettable
7 powder formulations. Exposure is limited to filling the spreading equip-
8 ment. After application, the material is disked into the soil.

9 The use of PCNB is relatively safe for the following reasons:

- 10 1. It is rarely applied more than once for each crop.
- 11 2. It is used only a short period of the growing season, i.e.,
12 usually at or just before seeding or planting.
- 13 3. Workers handling it are exposed only for brief periods of
14 time, i.e., opening and pouring the material from containers
15 in which packaged.
- 16 4. Very few individuals are involved in the handling of the mat-
17 erial.
- 18 5. Small quantities of PCNB are used. For example, in the
19 treatment of cottonseed, only .2 to .3 pounds active PCNB
20 are used per acre. In-furrow or band treatments use only
21 1 to 5 pounds active PCNB per acre. With a few minor crops
22 the rate may go as high as 30 to 60 pounds active per acre.
the level of application is 2 to 6 inches
- 23 6. PCNB is applied or mixed into only the top 2 to 6" of soil.
- 24 7. PCNB has a short life span in the soil (half life of 6 weeks
25 at 75-80°F).
- 26 8. The actual application of PCNB is either on seed or directly
27 into soil so there is little danger of the material drifting.

1 9. After application, the PCNB is covered or disked into the
2 soil so it is not exposed.

3 10. PCNB is practically insoluble in water, therefore it stands
4 little chance of contaminating water systems.
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PCNB

1 Importance of ~~the pesticide~~ to agriculture

2 A. Major uses

3 1). Cotton

4 The largest use of PCNB is ~~in~~ the control of seedling disease
5 of cotton. It is estimated (Minton 1978) that 520,000 - 540,000 pounds
6 of active ingredient are used in the cotton belt as a seed treatment, re-
7 sulting in enough treated seed to plant 6 million acres of cotton. In
8 addition, 1 million pounds of active ingredient are used as an in-furrow
9 treatment to treat another 1 million acres.

10 The primary organisms involved in the seedling diseases of
11 cotton include Rhizoctonia solani, Pythium sp., Sclerotium rolfsii, Thie-
12 laviopsis basicola, Colletotrichum gossypii, and Meloidogyne incognita
13 ~~(Anonymous; Bird, 1974; Bollenbacher and Fulton, 1959; Fulton and Bol-~~
14 ~~lenbacher, 1959; Pinckard and Ivey, 1971; and Presley and Bird, 1968).~~ Of
15 these, pre-emergence killing was much more prevalent with Rhizoctonia so-
16 lani and Pythium ultimum than with other fungi (~~Fulton and Bollenbacher,~~
17 ~~1959).~~ In the same studies, it was pointed out that over a four-year
18 period, Rhizoctonia solani occurred in 42% of the seedlings cultured;
19 whereas, Fusarium (3 different species) were found in 49% of the seedlings.

20 In regard to the fungi involved in the seedling diseases of cotton,
21 PCNB is effective in controlling Rhizotocnia solani and Sclerotium rolf-
22 sii. Inasmuch as no fungicide is available which is effective against
23 all of the primary organisms involved in the seedling diseases of cotton
24 ~~(Bird, Rannoy and Watkins, 1957; Bird and Raheem, 1967),~~ and inasmuch
25 as Rhizoctonia solani is the most important fungus of those attacking
26 cotton seedlings, PCNB is the most widely used fungicide but it is mixed
27 with other fungicides when used on cotton. Because so many organisms

1 are involved in the seedling diseases of cotton, it is difficult to esti-
2 mate the losses due to the various disease-producing agents. However,
3 the annual reduction in lint yield from seedling diseases from 1968
4 through 1977 was 2.9% or 319,982 bales (¹⁶~~Crawford 1968-1978~~). (At \$324 per
5 bale, the annual loss was \$103,674,168. These losses occur even though
6 fungicides were used. It is estimated that without fungicides, the
7 losses would have exceeded 20% or \$714,994,262.) The losses would have
8 been larger had the reduced seed and lint qualities, root damage result-
9 ing in delayed maturity and costs of replanting been included.

10 In California, it is estimated that about 1 1/2 million acres
11 of cotton were grown last year and that of this amount 20% of the seed
12 was treated with PCNB and 10% of the acreage was treated with PCNB as an
13 in-furrow treatment (²⁵~~R. Garber personal communication~~).

14 Disease control in cotton results from either seed treatment
15 or soil treatment at the time of planting, (~~Minton 1978~~). Thus the PCNB
16 is used only at one time during the growing season. With either type of
17 application, it is put into the soil and covered, thus exposing none to
18 the atmosphere. In cotton, extremely small amounts of PCNB are used.
19 When seeds are treated, approximately 1/2 ounce of PCNB is used per acre.
20 When used as an in-furrow treatment only 1 pound is used per acre. Con-
21 tact by handlers is limited to loading hopper boxes and/or treated seed.

22 2). Peanuts

23 The second most important use of PCNB is in the production of
24 peanuts, most of which are grown in the southeastern states. Southern
25 stem rot, resulting from infection by Sclerotium rolfsii, is the most
26 serious disease of peanuts. Of the 1.5 million acres used for peanuts in
27 the U.S., it is estimated that 20-30% is infested with this fungus. How-

Most PCNB on peanuts was used in Georgia followed in order by Oklahoma, Texas, Alabama, North Carolina, Virginia, South Carolina and Florida.

1 ever, it is a potential problem on the entire acreage. In 1977. PCNB was
2 used on 144,000 acres (9.6% of the total peanut acreage) at the rate of
3 10 pounds active ingredient per acre resulting in a total useage of 1.44
4 million pounds.

5 Most PCNB on peanuts was used in Georgia followed in order by
6 Oklahoma, Texas, Alabama, North Carolina, Virginia, South Carolina and
7 Florida. It is estimated that the loss due to this disease in 1977 was
8 \$71,927,900 but if PCNB had not been available, the losses would have
9 been \$109,777,000, thus saving the peanut growers \$27,850,000. Had it
10 been used on the remaining infested acreage, the savings would have been
11 at least \$50,000,000 more than they were (Thompson, 1978).

12 In peanuts, the fungus may produce root rot, pod and peg rot or
13 stem rot, the latter of which is the most important (²⁸~~Garrison and Jackson~~
14 ~~1973~~). It occurs late in the season, usually during the last 45 days.
15 Because of this, PCNB is applied in a 12 inch band over the foliage at
16 pegging time (40-60 days after planting). Usually a single application
17 is made. (~~Thompson 1978~~) The wettable powder, dust and granules are re-
18 gistered but 95% of the total amount applied on peanuts is the 10% gran-
19 ule. PCNB also is registered as a pre-plant and planting time treatment.

20 Because PCNB on peanuts is used as a granular and as a single
21 application, the exposure hazards are minimal. No mixing is required,
22 there is practically no danger of drift during application and the granu-
23 lar material, when applied, falls to the soil. Workers do not move
24 through the field on foot, therefore there is little chance of exposure.
25 Because the granular form is used mostly, exposure is estimated to be one
26 minute per acre.

Specialty

B, ~~Minor~~ Crops

specialty

The amount of PCNB used on ~~minor~~ crops amounts to about 4% of the total. This is used principally on vegetables, ornamentals and turf, small grains and sugar beets.

1). Vegetables

In vegetables, disease-producing organisms which are controlled by PCNB include Rhizoctonia solani, Sclerotium rolfsii, Sclerotium cepivorum, Plasmodiophora brassicae and Streptomyces scabies.


Of these, Rhizoctonia solani occurs as a problem on members of the Cruciferae (broccoli, Brussels sprouts, cabbage, cauliflower, etc.) beans, peas and potatoes but it is most severe on crucifers and potatoes. In crucifers, the fungus may cause damping off of seedlings or infect mature plants causing a disease called wire stem. PCNB is needed for control in California and New York for seedbeds. On grown plants, it is used on about 1000 acres in Florida and 2000 acres in Georgia. In Michigan, about 8000 acres are treated for the control of Rhizoctonia and Plasmodiophora brassicae (Stevenson 1978).



Plasmodiophora brassicae is the causal agent of club root disease of crucifers. In New York, yield losses on cabbage and cauliflower have been reported as high as 40% and PCNB is now used on 13,500 acres. In some areas of Michigan, the cabbage and cauliflower crops in 1975 were a total loss. (~~Stevenson 1978~~) In California 500 acres are infested with the fungus. It is estimated that only 30% of the crop would be harvested if the fungus were not controlled by PCNB (⁵⁴~~Sclaroni personal~~ communication).
1

To control Rhizoctonia or Plasmodiophora, PCNB is added either as a transplant drench or as a preplant treatment as a row or broadcast

1 application. Formulations used include the 75% w.p., 10% dust or 10%
2 granules. All applications are applied only once per crop and in all, the
3 PCNB is covered in transplanting or disked into the soil. (~~Stevenson 1978~~)

4 Rhizoctonia also occurs on beans causing damping off and
5 hypocotyl rot. Although PCNB is registered on beans, very little is used.
6 In New York, less than 2000 acres were treated whereas in Nebraska, less
7 than 500 acres were treated (Kraft 1978).

8 Potatoes are also infected by Rhizoctonia resulting in either
9 cankers on the stems and stolons or a killing of the young shoots. The
10 fungus produces resting structures on the outsides of the tubers which
11 do not damage the tubers but may be a source of inoculum to infect the
12 new growth if such tubers are used as a source of seed pieces. It is
13 estimated that a 10% yield loss occurs in untreated fields. ~~According~~
14 ~~to Weinhold (personal communication)~~ PCNB at low concentrations is effec-
15 tive in inhibiting Rhizoctonia and when used can reduce severity of stem
16 and stolon cankers by 50-60% ⁽⁶²⁾ If controlled, the values of the U.S.
17 potato crop would be increased by about \$15 million. 

18 Common scab, resulting from infection by the bacterium Strepto-
19 myces scabies reduces the quality of potato tubers.  In Idaho, it is es-
20 timated that revenue loss is at least 5% due to this disease-producing
21 agent.  PCNB is the most dependable control and where scab is severe, a
22 PCNB treatment may mean the difference between staying in or not staying
23 in business. (~~Kraft 1978~~)

24 PCNB is used as a soil treatment prior to or at the time of
25 planting on potatoes. Only a single application is made and either way
26 the material is incorporated into the soil. (~~Kraft 1978~~)

27 Sclerotium rolfsii is severe in the southern states,

1 particularly on tomato and pepper crops where it causes losses as high as
2 20%. This fungus attacks plants at the soil line causing death of in-
3 fected plants. In Georgia, it is estimated that 2000 acres of peppers
4 and 100 acres of tomatoes are treated to control this fungus. Inasmuch
5 as these crops are sometimes rotated with peanuts, it makes control that
6 much more important. ~~(Stevenson 1978)~~. PCNB may be added to the trans-
7 plant water or as a trench spray at planting time or it may be added as
8 a trench dust prior to transplanting. ~~(Stevenson 1978)~~. In any of the
9 methods of application, the PCNB is covered by soil and is not left
10 exposed to the air.

11 Sclerotium cepivorum is a serious fungus on garlic in Califor-
12 nia where 9,100 acres were produced in 1976 (with a value of approximately
13 \$12 million) It is estimated that the fungus occurs on 10-20% of the
14 acreage and causes annual losses of 5-10% ~~(Stevenson 1978)~~. Control
15 with PCNB is essential. The material is applied as an in-furrow treat-
16 ment, as a row treatment or as a clove treatment. In all of the treat-
17 ments, the PCNB is covered by soil following planting thus reducing ex-
18 posure. ~~(Stevenson 1978)~~

19 2). Ornamentals

20 a). ~~According to the EPA (Summings 1976)~~, PCNB is labelled ⁽¹⁹⁾ for
21 use on ornamental plants as follows:

22 i). to control Rhizoctonia solani on African violets, be-
23 gonia, carnation, chrysanthemum, dichondra (included in this report with
24 turf grasses), Easter lily, poinsettia, snapdragon, and sweet peas. Ac-
25 tual amounts used were difficult to determine. In regard to carnations,
26 in California, there are approximately 500 acres of carnations ³² ~~(Hasek-~~
27 ~~personal communication)~~. Approximately 1/2 of the acreage is replanted

1 each year and it is estimated that at least 1/2 of this is treated with
2 PCNB to control Rhizoctonia. which infects young. rooted cuttings after
3 planting. (²³~~Farrham Personal communication~~). The material is applied at
4 the rate of 1[#] of the 75% wettable powder per 1000 sq. ft. as a drench
5 or dusted onto the soil and then rototilled in the top 3 to 4 inches.
6 Excellent control is obtained (⁵⁵~~Sciaroni and Raabe 1955~~).

7 Chrysanthemums (standards, pompoms and pots) accounted for
8 sales of 116 million dollars in 1976 (¹⁷~~Crop Reporting Board 1977~~). Of the
9 main soil borne disease-producing organisms, Rhizoctonia, Sclerotinia and
10 Pythium are important. According to Horst and Nelson (³⁷~~1975~~) in their
11 publication on diseases of chrysanthemum, PCNB is recommended for control
12 of Rhizoctonia and is listed as one of several fungicides for control of
13 Sclerotinia.

14 ~~According to Knauss (personal communication)~~ Rhizoctonia is one
15 of the more serious pathogens of foliage plants in the \$111 million in-
16 dustry in Florida ⁽¹⁷⁾~~and he estimates that~~ at a minimum ⁽⁴²⁾~~it~~ causes a 5% loss.
17 ~~(or more than \$5 million dollars per year)~~ Without PCNB, the loss would
18 be much greater.

19 Rhizoctonia is important on lilies and poinsettias but because
20 it occurs with other fungi, it will be discussed under labels with mix-
21 tures.

22 ii). to control Sclerotinia sclerotiorum on calendula, larkspur,
23 snapdragon, and sweet peas and also to control Sclerotinia bulborum on
24 hyacinth, iris, narcissus and tulip.

25 In regard to S. sclerotiorum, little information on the listed
26 crops is available. ~~According to the Crop Reporting Board (1977) the~~
27 ~~wholesale value of plants in Florida in 1976 was \$111 million. Recently~~

1 ~~PCNB was reported to be~~
 however, ¹ ~~J.F. Knauss, (personal communication)~~ stated that PCNB is one
 2 of the fungicides which gives effective control of this fungus on foliage
 3 plants. ⁽⁴²⁾
 4

5 Good control of S. bulborum on hyacinth, iris and tulip with
 PCNB has been reported ²⁹ ~~(Gould and Russell 1965)~~.
 6

7 iii). to control Sclerotium rolfsii on hyacinth, iris, bulbous
 8 iris, narcissus and tulips. The amount used on these crops could not be
 determined. ~~Knauss (personal communication)~~ estimates ^{are estimated} The losses in or-
 9 mental foliage plants from this fungus, to be between 3-5% ⁽⁴²⁾ and has found
 10 PCNB ~~to~~ gives effective control on Schefflera, Peperomia ^{1, 2} ~~(Alferi and Knauss~~
 11 ~~1970, Alferi and Knauss 1972)~~ and many other foliage plants ⁴² ~~(Knauss, personal com-~~
 12 ~~munication)~~. Without it, ~~Knauss~~ said the foliage plant industry would be
 13 in serious trouble.

14 iv). to control Sclerotinia camelliae on camellias (flower blight) and
 15 Ovulinia azaleae on azaleas (flower blight). In trials to control camellia
 16 flower blight ⁴ ~~(Ansalone and Plakidas 1956)~~, it was determined PCNB gave
 17 best control of the materials tested. Shurtleff ⁵⁶ ~~(1966)~~ included PCNB in
 18 the control measures for azalea petal blight.

19 b). ~~According to Cummings (1976)~~ PCNB is labelled in mix-
 20 tures with other fungicides for the control of damping off and/or root
 21 and stem rots where complexes of various pathogens occur in African vio-
 22 lets, begonia, calendula, carnation, chrysanthemum, dahlias, flowering
 23 plants, iris, larkspur, lily (Croft Easter lily), nursery plants, orna-
 24 mental shrubs, poinsettia, snapdragon, sweet peas and tuberous begonia. ⁽¹⁹⁾
 25 Although large quantities of PCNB are not used, the use is essential
 26 whenever Rhizoctonia is present in the disease complex.

27 In the production of poinsettias as a pot plant, the

1 wholesale value of the crop in the United States in 1976 was \$35 1/2 mil-
2 lion (¹⁷~~Grop Reporting Board 1977~~). In the currently available literature
3 on the production of this plant (^{6, 8, 21}~~Ball 1972; Bing et al. 1974; Ecks 1976~~),
4 all recommend either PCNB as a drench after planting if Rhizoctonia alone
5 is present or PCNB + Dexon as a drench after planting if Rhizoctonia and
6 Pythium are present.

7 Potted lilies are an important crop and it is estimated that
8 7 million were sold in 1976 with an estimated wholesale value of 14 mil-
9 lion dollars. (¹⁷~~Ball (1972)~~ ⁶ recommendations for potted lily production in-
10 clude:

- 11 1. drenching the soil with Dexon-PCNB at first watering;
- 12 2. add PCNB-captan to the potting soil and;
- 13 3. immerse the bulbs for 5-15 minutes before potting in water
14 containing PCNB and ferbam.

15 Bing et al. (⁸~~1974~~) recommended drenching newly potted bulbs with a mix-
16 ture of PCNB-Dexon.

17 ~~According to the Grop Reporting Board (1977)~~ ⁽¹⁷⁾ the wholesale
18 value of flowering bedding plants in 1976 was \$61.4 million. ¹ If vege-
19 table bedding plants are added to this, it raises the total to \$108.4
20 million. The amount of PCNB used is unknown. However, Rhizoctonia is
21 part of the damping off complex, which if uncontrolled, usually results
22 in the complete loss of all plants growing in any container (flats, pony
23 packs, etc.) where it occurs. ~~According to Masterlans (1976)~~ ⁽⁴⁷⁾ Prevention
24 of Rhizoctonia in bedding plants may be done either with benomyl or PCNB ⁷

25 c). In summary, although a large quantity of PCNB is not used
26 in controlling disease-producing organisms on ornamental plants, it ap-
27 pears that there is a critical need for the chemical in that:

1 i). The California carnation industry uses it as a pre-
2 plant treatment before setting out rooted cuttings.

3 ii). The recommendations in growers manuals for handling
4 poinsettias include a PCNB-Dexon drench at planting time.

5 iii). The recommendations in growers manuals for producing
6 Easter lilies include either a PCNB-Dexon drench or a drench plus a PCNB-
7 captan soil treatment and a PCNB-Fermate bulb dip.

8 iv). The manual on bedding plant production recommends PCNB
9 to control Rhizoctonia.

10 v). It is effective in control of Sclerotinia bulborum on
11 hyacinth, iris, and tulip.

12 vi). It is the only effective material for controlling the
13 azalea flower blight fungus and the camellia flower blight fungus.

14 vii). It is important in the control of Sclerotium rolsii,
15 Sclerotinia sclerotiorum and Rhizoctonia in the production of foliage
16 plants.

17 3). Turfgrasses

18 PCNB is labelled for the control of more different kinds
19 of plant pathogenic fungi on turf grasses than any other single group of
20 plants. It is labelled for Rhizoctonia (brownpatch), Sclerotinia (dollar
21 spot), Typhula (gray snow mold), Fusarium (pink snow mold), Puccinia
22 (rusts), Ustilago (stripe smut) and leaf spot (causal organism not iden-
23 tified on bluegrass, centipede grass, fescue, ryegrass and St. Augustine
24 grass. In addition, it is labelled along for brownpatch on bentgrass,
25 Bermuda grass and dichondra. It also is labelled with other fungicides
26 for the control of various diseases including cottony blight, fading out,
27 gray leaf spot, melting out and powdery mildew on some or all of the

1 grasses listed (and dichondra).

2 It is estimated that there are 10 million acres of turf asso-
 3 ciated with industrial sites, recreation areas, public facilities and
 4 sod farms. Golf courses alone account for 1 1/2 million acres. (In
 5 1975 the lawn and garden industry estimated that \$1.1 billion was spent
 6 for chemicals. How much of this was PCNB could not be determined (Hoff-
 7 man, et al.).

8 In the control of the various disease-producing fungi in turf
 9 with PCNB, generally only one application is made per growing season,
 10 though occasionally more than one application may be made.

11 4). Small grains

12 In the Pacific Northwest, PCNB is used as a seed treatment
 13 on winter wheat to control Ustilago (common bunt). (Without control, it
 14 is estimated losses due to this fungus would be \$4.5 million (Hoffman
 15 1977).) Excellent control with inoculated wheat seeds has been obtained⁽³⁾,
 16 by ~~Hansing (1973)~~^{35, 36}. Hoffman (1973, 1974) obtained almost 90-100% control
 17 using inoculated seeds in both infested and non-infested soil. PCNB al-
 18 so is used in controlling flag-smut of wheat (Ustilago) in Washington
 19 (~~Line 1973 and Line and Hewitt 1974~~)^{45, 46}.

20 PCNB is registered as a seed treatment on wheat and is used at
 21 the rate of .25 to .5 oz. per bushel. Seeding rate is about 1 bushel
 22 per acre meaning that extremely small quantities of PCNB are used.

23 In California, approximately 125,000 acres of barley, 90,000
 24 acres of wheat and 25,000 acres of oats are grown. To control bunt of
 25 wheat and covered smuts of barley and oats, PCNB is used as a seed
 26 treatment material and it is estimated that at least half the seed
 27 planted each year is treated (~~Hall, personal communication~~)³⁰..

5). Sugar beets

To prevent damping off of sugar beets resulting from Rhizoctonia and Pythium sp., it is common practice to treat sugar beet seed with a mixture of PCNB-Dexon. Only 2 oz. of active PCNB are used per 100 # of seed (³⁰~~Hall, personal communication~~), and only 2 to 3 pounds of seed are used per acre. It is estimated that in 1977, sugar beet acreage in the leading states was as follows: Minnesota, 260,000; California, 250,000; Idaho, 106,000; Colorado, 72,000; Nebraska, 67,000; and Washington, 62,000. (³⁴~~Hills, personal communication~~).

PCNB

Importance of maintaining ~~the pesticide~~ uses in agriculture

The largest use of PCNB is on cotton for the control of Rhizoctonia solani, the most important organism of a complex of fungi involved in seedling diseases of that plant. In most years, about 77% of all PCNB is used either as a seed treatment or an in-furrow treatment on this crop. (Even with seed treatment, losses are about \$104 million but without seed treatment, losses would be \$715 million. These losses are only those which are direct and do not include those which are indirect.) Presently, PCNB is the cheapest and one of the more effective fungicides used in the production of this important crop. In cotton, PCNB is applied either as a seed treatment or as an in-furrow treatment at the time of planting. With seed treatment, approximately 1½ ounces of active PCNB are used per acre. In-furrow treatment uses about one pound active PCNB per acre. In view of the extremely small amounts use, the very limited exposure of the workers (plumbing seed treatment equipment and loading hoppers with seed or the fungicide), the fact that the material is used only once in a growing season, the fact that the treated seed and the fungicide are covered by soil when used, the fact that PCNB is very insoluble and does not enter drainage or run-off water, and that it breaks down fairly rapidly in the soil plus the fact that it is very important in the production of a major crop, the benefits from the use of PCNB on cotton must be considered outstanding.

Another major use of PCNB is in the production of peanuts where PCNB is used to control the soil-borne Sclerotium rolfsii. Generally about 17% of the total PCNB is used on this crop though in 1977, because of a

1 very severe outbreak of S. rolfsii in peanuts, almost one half of the
2 total PCNB used that year was used on this crop. Even then, it was used
3 only on about 10% of the peanut acreage and it is estimated that 20-30%
4 of the acreage is infested with this fungus. (It is estimated that PCNB
5 saved the peanut growers nearly \$28 million in 1977 and that if the rest
6 of the infested acreage had been treated, the savings would have been
7 \$50 million.) In peanuts, PCNB is used principally to control stem rot
8 which occurs late in the growing season. PCNB is applied in a 12 inch
9 band as a granular material in a single application at pegging time.
10 Although applied to the tops of the plants, the material falls to the
11 soil. Exposure is limited to loading the hopper boxes and there is no
12 travel through peanut fields by foot at this time of the growing season.
13 The granular form also minimizes the exposure. PCNB is the cheapest and
14 most effective material for controlling this important disease-producing
15 agent of peanuts, exposure is extremely limited, only a single applica-
16 tion is made using the granular form and therefore the benefits from the
17 use of PCNB on peanuts are outstanding.

18 The ^{specialty} ~~minor~~ uses of PCNB amount to about 4% of the total. Though the
19 amounts are not large, they are very important in the control of certain
20 disease-producing agents. In the production of crucifer crops, control
21 of Plasmodiophora brassicae, the causal agent of club root, is essential
22 in soils infested with the fungus. Losses due to this fungus have been
23 estimated at 40% on cabbage and cauliflower in New York, would be 70%
24 on Brussels sprouts in California if not controlled and have been 100%
25 in some areas of Michigan on cabbage and cauliflower. PCNB is used in
26 either the transplant water or is disked into the soil prior to planting.
27 A single application is made per growing season and the material is

1 covered by soil with either method of application.

2 PCNB is also used to control Rhizoctonia solani on a number of
3 plants, including carnations, potatoes, foliage plants, chrysanthemums
4 and crucifers. Losses of foliage plants would amount to 3-5% in Florida
5 if not controlled. If controlled on potatoes, the savings would be \$25
6 million. The losses on carnations are not known but half the acreage
7 in California is treated with PCNB prior to planting. The leading man-
8 ual on chrysanthemum production recommends PCNB for control of Rhizocto-
9 nia on that crop. In all of these crops, PCNB is added to the soil
10 once before planting and then is worked into the soil thereby limiting
11 exposure.

12 PCNB is also used to control Rhizoctonia solani in complexes where
13 other disease-producing agents occur and therefore it is mixed with
14 other fungicides. This is particularly true on poinsettias and Easter
15 lilies. The leading manuals on the culture of these plants include
16 PCNB in the standard recommendations for growing these plants. As with
17 other crops, it is mixed in the soil or used as a bulb dip prior to
18 planting.

19 A number of disease-producing organisms occur on various turf
20 grasses which are controlled by PCNB. These include: Rhizoctonia, Scle-
21 rotinia, Typhula, Fusarium, Puccinia and Ustilago. A number of formula-
22 tions are available for use on turf, including the granular. Most ap-
23 plications are made once a growing season.

24 In small grains, PCNB is used as a seed treatment for control of
25 covered smuts. Very small amounts (.25 to .5 oz) per bushel (1 bushel
26 to an acre) are used to give extremely high control on wheat, barley
27 and oats. PCNB is as effective and far cheaper than other materials

1 being used.

2 Sugar beets are subject to seedling diseases resulting from Rhizoc-
3 tonia and Pythium sp. It is a common practice to treat sugar beet seed
4 with PCNB-Dexon. Only 2 oz active PCNB are used per 100# of seed and
5 2 to 3 pounds of seed are used per acre.

6 It is apparent that PCNB is a selective chemical controlling a
7 limited number of fungi in the lower Basidiomycotina (Rhizoctonia, Scle-
8 rotium, Typhula, Ustilago and Puccinia) some fungi in the higher Ascomy-
9 cotina (3 species of Sclerotinia and Ovulinia), one fungus in the Fungi
10 Imperfecti (Fusarium), a fungus in the Mastigimycotina (Plasmodiophora
11 brassicae) and a bacterium (Streptomyces scabies). Because of its
12 rather limited effective range, the material will do little to upset
13 the biological balance in soils when used in controlling plant disease
14 organisms.

Conclusions and summary

On the basis of information presented here regarding PCNB, it can be concluded that:

1. PCNB is effective in controlling: major soil-borne fungi such as Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Plasmodiophora brassicae, Streptomyces scabies; Ustilago on small grains and Ustilago, Sclerotinia, Typhula Fusarium and Puccinia on turf grasses; Sclerotinia bulborum on hyacinth, iris and tulip; and Sclerotinia on camellia and Ovulinia on azalea.

2. PCNB is safe to use, being applied as a seed treatment, an in-furrow treatment or as a soil treatment. In practically all applications, PCNB is covered by soil allowing very little exposed.

3. PCNB is usually applied once in a growing season.

4. As a seed treatment or in-furrow treatment, very small quantities of PCNB are used per acre.

5. PCNB is not water soluble and does not enter run-off water on drainage water

6. The seed treatment formulation dries to an exceedingly hard surface on the seed.

7. The granular formations leave little or not dust.

8. PCNB has a short life in the soil (6 weeks at 75-80° F).

9. Exposure to PCNB is minimal and is restricted principally to the plumbing of seed treaters and the pouring of treated seed or the fungicide into hoppers.

10. PCNB is usually lower priced than similarly effective fungicides.

1 11. PCNB is a selective fungicide in regard to the fungi against
2 which it is effective. The number of organisms is not large and there-
3 fore this material when used will upset the biological environment very
4 little as compared to a broad spectrum fungicide. _____

5 Because PCNB is effective in controlling a number of important plant
6 pathogens, because very little is used and when used, it is added to the
7 soil and usually is covered, because there is little chance of it enter-
8 ing air or water systems, because there is very little exposure danger
9 in application, ~~because it is competitively priced and because the~~
10 ~~benefits of PCNB are far greater than the risks and therefore regis-~~
11 the benefits of PCNB are far greater than the risks and therefore regis-
12 tration of PCNB should be continued.

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**** PRODUCT SEARCH LISTING ****

PAGE

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09/21/77

FEDERALLY REGISTERED PRODUCTS CONTAINING PCNB

REGISTRANT

NAME AND ADDRESS

* 000148 THOMPSON-HAYWARD CHEMICAL COMPANY
BOX 2383
KANSAS CITY KS 66110

***** PRODUCT NAME *****

**00764* DE-ESTER TERRACHLOR 10% GRANULES
**00780* DE-ESTER TERRACHLOR-CAPTAN NO 10-10
**01040* T-H 20% TERRACHLOR DUST
**01062* T-H TERRACHLOR 2 LB. EMULSIFIABLE CONCENTRATE
**01077* T-H 10% TERRACHLOR DUST

REGISTRANT

NAME AND ADDRESS

* 000239 CHEVRON CHEMICAL COMPANY
ORTHO DIVISION 940 HENSLEY WAY
RICHMOND CA 94801

***** PRODUCT NAME *****

**01522* ORTHO LAWN DISEASE CONTROL
**02073* ORTHOCIDE SOIL TREATER X-W
**02162* ORTHO PCNB 80 DUST CONCENTRATE
**02213* ORTHO SOIL TREATER 3 "X"
**02382* ORTHO ORTHOCIDE SOIL TREATER "X"

REGISTRANT

NAME AND ADDRESS

* 000241 AMERICAN CYANAMID COMPANY
BOX 400
PRINCETON NJ 08540

***** PRODUCT NAME *****

**00146* THIMET 10% SYS. INSECT./TERRACHLOR SUPER X SOIL FUNGI. 3R

REGISTRANT *NAME AND ADDRESS*

* 000279 PMC CORP.
 AGRICULTURAL CHEM DIV.
 2000 MARKET STREET
 PHILADELPHIA, PA. 19103

***** PRODUCT NAME *****

**01250* NIAGARA PCNB 40 DUST CODE: 30260
**02223* NIAGARA PCNB10 ZINEB 10 SOIL TREATER
**02354* NIAGARA LANSTAN 10 PCNB-5 GRANULAR SOIL FUNGICIDE
**02591* TERRACLOE 6.5 SUPER X 1.6 THIMET 6.5 GRANULAR CODE: 31964
**02938* TERRACLOE 6.5 THIMET 6.5 GRANULAR
**02967* TERRACLOE 5 ZINEB 2/5 THIMET 5 COATED GRANULES
**02975* CAPTAN TERRACLOE 10-10

REGISTRANT *NAME AND ADDRESS*

* 000476 STAUFFER CHEMICAL COMPANY LABELING & REGISTRATION
 DEPT 1200 SOUTH 47TH ST
 RICHMOND, CA 94804

***** PRODUCT NAME *****

**01315* STAUFFER CAPTAN TERRACLOE 10-10 SEED PROTECTANT
**01437* TERRACLOE 10 DUST
**01500* CAPTAN-PCNB 10-10 DUST
**01739* TERRACLOE 10 G GRANULES
**01881* CAPTAN-PCNB 10-10 GRANULAR
**01928* CAPTAN TERRACLOE 30-30 WP SEED PROTECTANT
**01977* CAPTAN-TERRACLOE* 30-30 SEED PROTECTANT

REGISTRANT *NAME AND ADDRESS*

* 000524 MONSANTO COMPANY
 AGRICULTURAL PRODUCTS
 800 N. LINDBERGH BLVD.
 ST. LOUIS, MO 63166

***** PRODUCT NAME *****

**00121* PCNB 80% DUST CONCENTRATE
**00122* PCNB TECHNICAL GRADE

*****51
REGISTRANT *NAME AND ADDRESS*

* 000538 SCOTT O M & SONS COMPANY
MARYSVILLE OH 43040

***** PRODUCT NAME *****

**00040* PROTURF PF 11
**00050* FUNGICIDE WITH FERTILIZER FOR BLUEGRASS LAWNS
**00055* SCOTTS FUNGICIDE WITH FERTILIZER FOR ST. AUGUSTINE GRASS LAWNS
**00078* LAWN DISEASE CONTROL
**00096* NEW LAWN DISEASE CONTROL
**00103* PECTURE NEW PF II
**00116* SCOTTS TURF BUILDER PLUS LAWN DISEASE PREVENTER

REGISTRANT *NAME AND ADDRESS*

* 000550 VAN WATERS & ROGERS DIV OF UNIVAR
2256 JUNCTION AVENUE
SAN JOSE, CA 95131

***** PRODUCT NAME *****

**00091* GUARDSMAN SEED GUARD

REGISTRANT *NAME AND ADDRESS*

* 000554 AGSCO INC
BOX 458
GRAND FORKS ND 58201

***** PRODUCT NAME *****

**00110* AGSCO PCNB-E.C.

REGISTRANT *NAME AND ADDRESS*

* 000557 SWIFT AGRICULTURAL CHEMICAL
CORP.
111 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

***** PRODUCT NAME *****

**01856* VIGORO BROWN PATCH CONTROL PLUS FERTILIZER

REGISTRANT *NAME AND ADDRESS*
* 000728 SOUTHLAND PEARSON & COMPANY
 PO BOX 7151
 MOBILE AL 36601

***** PRODUCT NAME *****

**00091* PEARSONS GREEN LAWN FUNGICIDE

REGISTRANT *NAME AND ADDRESS*
* 000802 LILLY CHAS H COMPANY MILLER RD DIV
 7737 N.E. KILLINGSWORTH
 PORTLAND, OR 97218

***** PRODUCT NAME *****

**00494* MILLER S TERBACHLOR 200 FUNGICIDE

REGISTRANT *NAME AND ADDRESS*
* 000869 GREEN LIGHT COMPANY
 P.O. BOX 17985
 SAN ANTONIO, TX 78217

***** PRODUCT NAME *****

**00037* GREEN LIGHT BULE STARTER & FOOD

REGISTRANT *NAME AND ADDRESS*
* 001023 TUCO PRODUCTS COMPANY
 DIV UPJOHN CO 7171 PORTAGE RD
 KALAMAZOO MI 49001

***** PRODUCT NAME *****

**00010* ACTI DIONE - RZ

REGISTRANT *NAME AND ADDRESS*
* 001202 PUREGRO COMPANY
 1052 W 6TH ST
 LOS ANGELES CA 90017

***** PRODUCT NAME *****

**00105* GAVICIDE THINET PCNB 6.5-6.5

**00192* PUREGRO TERBACHLOR 20 DUST

**00193* PUREGRO TERBACHLOR 10 GRANULES

**00203* PUREGRO DI SYSTEM PCNB 6.5-6.5

REGISTRANT

NAME AND ADDRESS

* 001258

OLIN CHEMICALS
OLIN CORPORATION
120 LONG RIDGE ROAD
STAMFORD, CT 06904

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***** PRODUCT NAME *****

**00158* MATHIESON TERRACLO 20% DUST

**00185* OLIN TERRACLO 75% WETTABLE POWDER

**00279* TERRACLO 2 LB EMULSIFIABLE SOIL FUNGICIDE

**00286* TERRACLO 40% DUST SOIL FUNGICIDE

**00287* TERRACLO 10% DUST-SOIL FUNGICIDE

**00407* MATHIESON BRAND TERRACLO LANDPLASTER MIXTURE

**00466* MATHIESON TERRACAP 10-10-DUST

**00516* MATHIESON TERRACLO 80% DUST CONCENTRATE

**00517* OLIN TERRACLO TECHNICAL GRADE PCMB 99% SOIL FUNGICIDE

**00555* MATHIESON TERRACLO 10% GRANULAR

**00584* MATHIESON GREENBACK LAWN FUNGICIDE

**00588* OLIN TURFCIDE EMULSIFIABLE TERRACLO FUNGICIDE

**00740* OLIN TERRACLO SUPER-X EMULSIFIABLE SOIL FUNGICIDE

**00758* TERRACLO SUPER X GRANULAR 10-2.5 SOIL FUNGICIDE

**00759* OLIN TERRACLO SUPER X DUST-SOIL FUNGICIDE

**00760* OLIN TERRACLO SUPER X PRE MIX DUST SOIL FUNG TERRACLO PLUS TERRAZOLE

**00765* TURFCIDE 10% GRANULAR SOIL FUNGICIDE

**00776* TERRACLO SUP X SOIL FUNG WITH DI SYSTON SYSTEMIC INSECT GRANULAR

**00786* OLIN TERRA-COAT COTTON SEED TREATMENT

**00789* OLIN TERRACLO SUPER-X SOIL FUNG W/THIMET SYST. INSECT. GRAN

**00801* OLIN TERRACLO LIQUID SEED TREATMENT FUNGICIDE

**00806* TERRACLO

**00809* OLIN TERRACLO 6.5% PLUS DI-SYSTON 6.5% GRANULAR

**00810* OLIN TERRACLO SUPER-X-MOLY SEED TREATMENT FUNGICIDE

**00811* OLIN TERRACLO 6.5% SOIL FUNGICIDE WITH THIMET SYSTEMIC INSECTICIDE 6.5

**00813* OLIN TERRACLO SUPER-X-SEED DUST 20-5

**00814* OLIN TERRA-COAT L-41 SEED TREATMENT FUNGICIDE

**00816* OLIN TERRA-COAT L-205

**00819* OLIN TERRA-COAT WP 6015

**00821* OLIN TERRACLO 90% DUST CONCENTRATE

**00823* OLIN TERRACLO SOIL FUNGICIDE 30% GRANULAR

**00824* OLIN TERRA COAT WP-4010 WITH MOLY SEED TREATMENT FUNGICIDE

**CONTINUE REGISTRANT 001258

- **00882* OLIN-TERRA COAT LT 2 SEED TREATMENT FUNGICIDE
- **00884* OLIN-TERRA-COAT SD-205 SEED DUST FUNGICIDE
- **00888* OLIN TERRACLOS SUPER-X WITH GRAPHITE SEED TREATMENT FUNGICIDE
- **00914* OLIN TERRA-COAT 2-LF SEED TREATMENT FUNGICIDE
- **00943* OLIN TERRACLOS SUPER-X 20-5 WITH GRAPHITE
- **00944* OLIN TERRA-COAT 205-LF SEED TREATMENT FUNGICIDE
- **00964* OLIN-TERRACLOS 20% GRANULAR SOIL FUNGICIDE
- **00982* OLIN TERRA-COAT 2N-2055

REGISTRANT *NAME AND ADDRESS*

* 001339 COTTON STATES CHEM CO INC
 P O DRAWER 157
 W MONROE LA 71291

***** PRODUCT NAME *****

**00187* FURROW-TEC TERRACLOS EMULSIFIABLE CONCENTRATE

REGISTRANT *NAME AND ADDRESS*

* 001526 A G CHEM-CHEM DIST
 ARIZONA AGROCHEMICAL CO.
 P.O. BOX 21537
 PHOENIX AZ 85036

***** PRODUCT NAME *****

**00411* PHOENIX BRAND GRANULAR INSECTICIDE

**00439* PHOENIX BRAND PCNB 10% GRANULAR

**00492* PHOENIX BRAND GRANULES CONTAINING THIMET 6.5 PLUS PCNB 6.5

REGISTRANT *NAME AND ADDRESS*

* 002169 PATTERSON CHEMICAL COMPANY INC
 1400 UNION AVE
 KANSAS CITY, MO 64101

***** PRODUCT NAME *****

**00173* PATTERSON'S ROOT AND CROWN ROT CONTROL

REGISTRANT

NAME AND ADDRESS

* 002342

KERR-MCGEE CHEMICAL CORP
MGR PKG & LABELING
KERR-MCGEE CENTER
OKLAHOMA CITY OK 73102

***** PRODUCT NAME *****

**00759* GRO-TONE LAWN FUNGICIDE SPRAY

**00788* 10% THIRAM 10% PCNB

**00836* 20% TERRACHLOR DUST

REGISTRANT

NAME AND ADDRESS

* 002749

ACETO CHEMICAL COMPANY INC
126-02 NORTHERN BLVD
FLUSHING NY 11368

**00009* PCNB 100

**00289* CAPTAN PCNB 30-30 FUNGICIDE SEED PROTECTANT

REGISTRANT

NAME AND ADDRESS

* 002935

WILBUR ELLIS CO.
P. O. BOX 1286
PRZEMO, CA 93715

***** PRODUCT NAME *****

**00208* RED-TOP TERRACHLOR 2 SPRAY

**00357* RED TOP PCNB 10 GRANULAR

**00361* RED TOP THIMET 6.5% SYST. INSECT W/PCNB 6.5% SOIL FUNG GRAN

**00362* RED TOP DI-SYSTON 6.5% SYST. INSECT. W/PCNB 6.5% SOIL FUNG GRAN

REGISTRANT

NAME AND ADDRESS

* 003125

CHEMAGRO DIV OF BAYCHEM CORP
BOX 4913
KANSAS CITY MO 64120

***** PRODUCT NAME *****

**00070* DEXON - TERRACHLOR 35-35 WETTABLE POWDER

**00109* DEXON-TERRACHLOR 5-5 GRANULAE SOIL FUNGICIDE

**00145* DEXON TERRACHLOR 2.5%-10% DUST

REGISTEANT

NAME AND ADDRESS

* 003743

SOUTHERN AGRICULTURAL CHEMICALS INC
PO BOX 527
KINGSTREE SC 29556

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***** PRODUCT NAME *****

**00251* 101 BRAND P C N B 75 WETTABLE

**00300* 30-30 PLANTER BOX TREATER

**00303* 10-10 PLANTER BOX TREATER

REGISTEANT

NAME AND ADDRESS

* 004185

SMITH-DOUGLASS DIV.
BORDEN CHEMICAL, BORDEN INC.
5100 VIRGINIA BEACH BLVD.
NOBPCOLK, VA 23501

***** PRODUCT NAME *****

**00229* CHAMPION LANDPLASTER WITH TERRACHLOR FOR PEANUTS

REGISTRANT

NAME AND ADDRESS

* 004581

PENNWALT CORP AGCHEM DIV.
PENNWALT TECHNOLOGICAL CENTER
P.O. BOX C
KING OF PRUSSIA, PA 19406

***** PRODUCT NAME *****

**00260* PCMB TECHNICAL

**00264* PCMB FUNGICIDE

REGISTEANT

NAME AND ADDRESS

* 005522

PRYLINK ADRIAN ASSOCIATION
BOX 339
BAEYLOM NY 11702

***** PRODUCT NAME *****

**00001* AAZUMA

REGISTRANT

NAME AND ADDRESS

* 005905

BELENA CHEMICAL CO
CLARK TOWER, 5100 POPLAR AVE, SUITE 2904
MEMPHIS TN 38137

***** PRODUCT NAME *****

REGISTRANT *NAME AND ADDRESS*

* 005567 MOYES CHEMICAL COMPANY
BOX 945
SAN JOSE CA 95108

***** PRODUCT NAME *****

**00055* DEXACLOB 35-35

REGISTRANT *NAME AND ADDRESS*

* 006720 SOUTHERN HILL CREEK PRODUCTS COMPANY INC
BOX 1096
TAMPA FL 33601

***** PRODUCT NAME *****

**00075* SECP TTC TURP FUNGICIDE

REGISTRANT *NAME AND ADDRESS*

* 007001 OCCIDENTAL CHEMICAL CO
P O BOX 198
LATHEOP, CA 95330

***** PRODUCT NAME *****

**00068* BEST TEREACLOB 40 DUST

**00175* TEREACLOB 2 EC

REGISTRANT *NAME AND ADDRESS*

* 007401 VOLUNTARY PURCHASING GROUP INC
PO BOX 460
BONHAM TX 75418

***** PRODUCT NAME *****

**00042* FERTI-LONE LAWN & GARDEN FUNGICIDE

**00084* FERTI-LONE LIQUID FUNGICIDE FOR BROWN PATCH CONTROL

**00163* FERTI-LONE AZALEA-CAMELLIS-GARDENIA PROBLEMS SOLVER

**00197* FERTI-LONE CONTAINING FUNGICIDE

REGISTRANT *NAME AND ADDRESS*

* 009779 RIVERSIDE CHEM COMPANY
P.O. BOX 171199 855 RIDGE LAKE BLVD
MEMPHIS TN 38117

***** PRODUCT NAME *****

NAME AND ADDRESS

BOY'S CRISTAL CO. 11
BOX 972
SAN JOSE CA 95106

*** 2502.01 2492 ***

DEPT FOR DE-11

NAME AND ADDRESS

BOY'S CRISTAL CO. 11
BOX 972
SAN JOSE CA 95106

DEPT FOR DE-11

NAME AND ADDRESS

BOY'S CRISTAL CO. 11
BOX 972
SAN JOSE CA 95106

DEPT FOR DE-11

DEPT FOR DE-11

NAME AND ADDRESS

VOLUNTARY FIREFIGHTING GROUP 11
BOX 972
SAN JOSE CA 95106

DEPT FOR DE-11

DEPT FOR DE-11

DEPT FOR DE-11

DEPT FOR DE-11

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REGISTRANT *NAME AND ADDRESS*

* 010226 ROCKWOOD CHEM COMPANY
BOX 34
BRAWLEY CA 92217

***** PRODUCT NAME *****

**00005* ROCKWOOD ER SYST T THINET 6.5% INSECT W/PCNB SOIL FUNG GRAN FOR CO
**00014* ROCKWOOD BRAND LITTLE PEBBLES CONTAINS DI SYSTON 6.5% PCNB 6.5%
**00032* ROCKWOOD BRAND TERRACLO 2 LB. E.C.

REGISTRANT *NAME AND ADDRESS*

* 010290 PROFESSIONAL CHEMICAL COMPANY INC
P.O. BOX 94071 4517 YALE ST
HOUSTON TX 77018

***** PRODUCT NAME *****

**00021* TEFEACLO 2E

REGISTRANT *NAME AND ADDRESS*

* 010659 OCCIDENTAL CHEMICAL COMPANY
BOX 1185
HOUSTON TX 77001

***** PRODUCT NAME *****

**00034* ZIFF LAWNFOOL 6-12-12 FUNGUS CONTROL

REGISTRANT *NAME AND ADDRESS*

* 010820 QUIMICA ORGANICA DE MEXICO S A
C/O BENEE ROMERO & CO, INC
103 ROCKWOOD AVE
CALEXICO CA 92231

***** PRODUCT NAME *****

**00001* PCNB TECHNICAL MATERIAL FOR MANUFACTURING PURPOSES ONLY

REGISTRANT *NAME AND ADDRESS*

* 010912 HAYNES CHEMICAL COMPANY
P.O. BOX 30
EAST GRAND FORKS, MN 56721

***** PRODUCT NAME *****

**00001* HAYNES SEED TREAT NO. 1

REGISTRANT

NAME AND ADDRESS

* 011489 GREEN-UP PLANT FOOD COMPANY
PO BOX 9
NACOGDOCHES TX 75961

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***** PRODUCT NAME *****

**00001* GREEN-UP LAWN-CARE PLANT FOOD

REGISTRANT

NAME AND ADDRESS

* 011656 WESTERN FARM SERVICE INC SHELL CHEM COMPANY
1025 CONNECTICUT AVE-STE 200
WASH DC 20036

***** PRODUCT NAME *****

**00029* TERRACLO* THIMET (R) 6.5 - 6.5

REGISTRANT

NAME AND ADDRESS

* 018773 TURNER SALES & SUPPLY INC
PO BOX 847
TIPTON GA 31794

***** PRODUCT NAME *****

**00002* T-S-P 4 WAY FOR SEED DISEASE CONTROL

REGISTRANT

NAME AND ADDRESS

* 033955 ACME DIVISION
PBI GOEDON CORP
300 SOUTH THIRD ST
KANSAS CITY, KS 66118

***** PRODUCT NAME *****

**00518* ACME BULB SAVER

Overall Summary

~~Summary of report and important conclusion~~

This report brings together the information on the importance of PCNB to the agricultural industry in the United States. ^{We have} It compares ^{the risks from exposure and ~~penches~~ ^{fields}} this importance with ^{that of the triggers, resulting in} the conclusion that the value of the benefits ^{is ~~justified~~ ^{continued}} are far greater than the detrimental effects of this pesticide and therefore registration of this pesticide should be continued. ^{no decision is} These ~~con~~ conclusions are based on the following facts:

1. The pesticide is effective against certain soil-borne or seed-borne disease-producing agents such as Rhizoctonia, Sclerotinia, Sclerotium, Ustilago, Plasmodiophora and Streptomyces and against a few pathogens found on lower stems and foliage including Typhula, some Fusarium, and some Puccinia.

2. Rhizoctonia is an important soil-borne fungus which is the most important of the disease-producing agents in the cotton seedling disease complex. It is estimated that if not controlled, this disease complex ~~would~~ ^{annual} cause losses of \$611,000,000 ~~per~~ year to the cotton industry.

3. Rhizoctonia is ~~also~~ controlled with PCNB on crucifers, potatoes, sugar beets, many ornamental plants and on turf.

4. PCNB is ~~extremely~~ effective in controlling Sclerotium on peanuts, peppers, tomatoes, many ornamentals and garlic.

5. PCNB is ~~very~~ effective in controlling Ustilago sp. on wheat, barley and oats.

6. PCNB is effective in controlling Streptomyces (scab) on potatoes.

7. PCNB ~~gives~~ ^{substantially} control of Sclerotinia sp. on many ornamental plants

This report brings together the information on the importance of PMS to the agricultural industry in the United States. It compares this importance with that of other pesticides and concludes that the value of the benefits are far greater than the damage caused by this pest. The benefits of this pesticide and therefore registration of this pesticide should be continued. These conclusions are based on the following factors:

1. The pesticide is effective against certain soil-borne or seed-borne disease-producing agents such as Rhizoctonia, Sclerotinia, Fusarium, Ustilago, Uromyces and Aspergillus and against a few fungi found on lower stems and foliage including Uromyces, some Fusarium, and some Puccinia.

2. Rhizoctonia is an important soil-borne fungus which is the most important of the disease-producing agents in the cotton seedling disease complex. It is estimated that if not controlled, this disease complex would cause losses of \$611,000,000 per year to the cotton industry.

3. Rhizoctonia is also controlled with PMS on crucifers, potatoes, sugar beets, many ornamental plants and on turf.

4. PMS is extremely effective in controlling Sclerotinia on peanuts, peppers, tomatoes, many ornamentals and garlic.

5. PMS is very effective in controlling Ustilago sp. on wheat, soy and rice.

6. PMS is effective in controlling Sclerotinia sp. on peaches, apples, and other fruit.

7. PMS very control of Sclerotinia sp. on many ornamentals and turf.

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